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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
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21 NATIONAL FEDERATION OF THE
BLIND, NATIONAL FEDERATION OF
22 THE BLIND OF CALIFORNIA,
MICHAEL HINGSON, and MICHAEL
23 PEDERSON,

24 Plaintiffs,

25 v.

26 UBER TECHNOLOGIES, INC.,

27 Defendant.
28

Case No. 3:14-cv-04086-NC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO MODIFY
SCHEDULE FOR PLAINTIFFS'
MOTION RE FEES AND COSTS**

Judge: Hon. Nathanael Cousins

Trial Date: None Set

Case No. 3:14-cv-04086-NC

JOINT STIPULATION AND [PROPOSED] ORDER TO MODIFY SCHEDULE FOR
PLAINTIFFS' MOTION RE FEES AND COSTS

Pursuant to Civil Local Rules 6-2 and 7-12, the undersigned counsel, on behalf of their respective clients, hereby respectfully submit the following stipulation to modify the briefing schedule for Plaintiffs' motion for attorneys' fees, costs, and expenses established by this Court's Minute Order ECF No. 181. Plaintiffs will file their fee motion should the parties fail to reach a negotiated resolution of Plaintiffs' second claim for attorneys' fees and costs for work monitoring Uber's compliance with the Settlement Agreement and Release (Apr. 29, 2016), ECF No. 84-1 ("Settlement").

The parties request that the Court modify the briefing schedule by extending the deadline for Plaintiffs to file their fee motion by one week to July 12. Due to the holiday and the press of other litigation, more time is required for final checks of the application and its supporting declarations. The Court has previously approved similar modifications to the briefing schedule for Plaintiffs' fee claims. Order granting [180] Stipulation (Jun. 13, 2019), ECF No. 181 ("June 13, 2019 Order") (extending filing deadline by one week); Order granting [170] Stipulation, ECF No. 171 (Jul. 16, 2018) ("July 16, 2018 Order") (extending by one week the deadline to file Plaintiffs' fee motion based on Plaintiffs' previous annual fee claim).

Modifying the briefing schedule would not affect implementation of the Settlement and Class Counsel's monitoring work, just as modifying the schedule for briefing Plaintiffs' previous fee claim did not affect settlement implementation and monitoring. July 16, 2018 Order. This year Plaintiffs requested, and the Court ordered, a schedule to brief a fee motion to resolve their second annual claim for attorneys' fees, costs, and expenses. Order Granting [176] Administrative Motion Setting Briefing Schedule (May 27, 2019), ECF No. 179. The parties stipulated to, and the Court ordered, an extension and modification of that briefing schedule. June 13, 2019 Order. In 2018, the parties requested, and the Court ordered, three extensions of the period to negotiate Plaintiffs' first claim for attorneys' fees and costs, a schedule to brief a motion for attorneys' fees and costs to resolve that claim, and an extension of that briefing schedule. July 16, 2018 Order; Order granting [168] Stipulation (May 26, 2018), ECF No. 169; Order (May 11,

2018), ECF No. 167; Order Granting (163) Stipulation (Apr. 27, 2018), ECF No. 164. The parties have not requested, and the Court has not ordered, any other modifications to the schedule in this case since the Settlement became effective.

The parties therefore agree to and stipulate to the following schedule:

1. If the parties are unable to negotiate a resolution of Plaintiffs' claim for attorneys' fees and costs, Plaintiffs shall file their motion for attorneys' fees and costs no later than July 12, 2019.

2. Uber shall file its opposition no later than four weeks after Plaintiffs file their motion for attorneys' fees and costs.

3. Plaintiffs shall file their reply no later than three weeks after Uber files its opposition.

IT IS SO STIPULATED.

DATED: July 5, 2019

Respectfully submitted,

ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/ Michael S. Nunez

Michael S. Nunez

Attorneys for Plaintiffs

DATED: July 5, 2019

LITTLER MENDELSON P.C.

By: /s/ Andrew M. Spurchise

Andrew M. Spurchise

Attorneys for Defendant

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1 Pursuant to Civil Local Rule 5-1(i), I, Michael S. Nunez, attest that concurrence in
2 the filing of this document has been obtained.

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4 DATED: July 5, 2019

/s/ Michael S. Nunez

Michael S. Nunez

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6 Pursuant to stipulation, IT IS SO ORDERED.

7
8 DATED: _____

Honorable Nathanael Cousins

United States Magistrate Judge